

BEFORE THE PUBLIC UTILITIES COMMISSION  
OF THE STATE OF HAWAII

PUBLIC UTILITIES  
COMMISSION

2009 NOV -9 A 10:57

FILED

In the Matter of )

PUBLIC UTILITIES COMMISSION )

Instituting a Proceeding to )  
Investigate Proposed Amendments )  
to the Framework for Integrated )  
Resource Planning. )

Docket No. 2009-0108

COUNTIES OF HAWAII, KAUAI, AND MAUI's  
SUBMISSION OF INFORMATION REQUESTS TO HAWAII SOLAR ENERGY  
ASSOCIATION (HSEA); HAIKU DESIGN AND ANALYSIS (HDA); BLUE PLANET  
FOUNDATION (BLUE PLANET); DEPARTMENT OF BUSINESS, ECONOMIC  
DEVELOPMENT AND TOURISM (DBEDT); KAUAI ISLAND UTILITY  
COOPERATIVE (KIUC); AND HAWAIIAN ELECTRIC COMPANIES (HECO)

AND

CERTIFICATE OF SERVICE

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Attorneys for the County of Kauai

BEFORE THE PUBLIC UTILITIES COMMISSION  
OF THE STATE OF HAWAII

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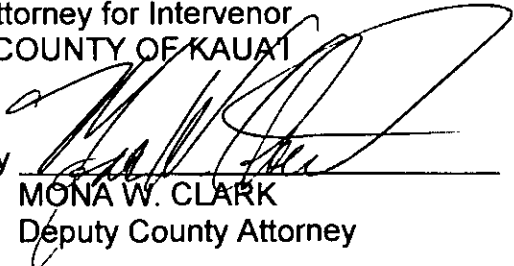
COUNTIES OF HAWAII, KAUAI, AND MAUI's  
SUBMISSION OF INFORMATION REQUESTS TO HAWAII SOLAR ENERGY  
ASSOCIATION (HSEA); HAIKU DESIGN AND ANALYSIS (HDA); BLUE PLANET  
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DEVELOPMENT AND TOURISM (DBEDT); KAUAI ISLAND UTILITY  
COOPERATIVE (KIUC); AND HAWAIIAN ELECTRIC COMPANIES (HECO)

Pursuant to the Order Approving the Stipulated Procedural Order, as modified, dated September 23, 2009, the Counties of Hawaii, Kauai, and Maui submit their Information Requests on the Preliminary Statements of Position (PSOP) filed in this docket to Hawaii Solar Energy Association (HSEA), Haiku Design and Analysis (HDA), Blue Planet Foundation (Blue Planet), Department of Business, Economic Development and Tourism (DBEDT), Kauai Island Utility Cooperative (KIUC) and Hawaiian Electric Companies (HECO).

DATED: Lihu'e, Kauai, Hawaii, November 4, 2009.


ALFRED B. CASTILLO, JR.  
County Attorney  
Attorney for Intervenor  
COUNTY OF KAUAI

By

  
MONA W. CLARK  
Deputy County Attorney

DATED: Hilo, Hawaii, November 4, 2009.

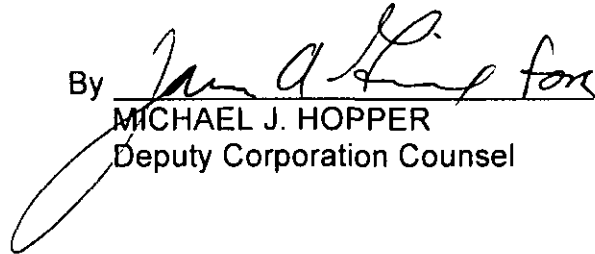
LINCOLN S.T. ASHIDA  
Corporation Counsel  
Attorney for Intervenor  
COUNTY OF HAWAII

By   
WILLIAM V. BRILHANTE, JR.  
Deputy Corporation Counsel

DATED: Wailuku, Maui, Hawaii, November 4, 2009.

BRIAN T. MOTO  
Corporation Counsel  
Attorney for Intervenor  
COUNTY OF MAUI

By

A handwritten signature in black ink, appearing to read "Michael J. Hopper", is written over a horizontal line. A large, loopy flourish extends from the bottom left of the signature.

MICHAEL J. HOPPER  
Deputy Corporation Counsel

DOCKET NO. 2009-0108

INVESTIGATIVE PROCEEDING ON PROPOSED AMENDMENTS  
TO THE FRAMEWORK FOR INTEGRATED RESOURCE PLANNING

INFORMATION REQUESTS TO HSEA; HDA; BLUE PLANET; DBEDT; KIUC and  
HECO

INSTRUCTIONS

In order to expedite and facilitate the Counties' review and analysis of the responses to the information requests, the Counties request that the Parties identify the person who is responsible for preparing the response. Additionally, the Counties request that all Parties review and follow the Requests for Information protocol as provided in the Stipulated Procedural Order, Exhibit A and approved by the Commission by Order on September 23, 2009.

**COUNTIES-HSEA-IR-1**

REF: HSEA PSOP Attachment A, E, 1,b,i.

Please explain your rationale and justification for the government advisory group member being either the Mayor of the county in which the utility in question provides service (or conducts business) or the mayor's designee? Does this limit the county to having just one member on the advisory group?

**COUNTIES-HSEA-IR-2**

REF: HSEA PSOP Attachment A,E,1,b,iv

Please explain the role of the independent facilitator for each advisory group. If there is an independent facilitator, who pays for the facilitator and how is the facilitator selected?

**COUNTIES-HDA-IR-1:**

REF: HDA PSOP Attachment A, (6)

Please explain your concept of an independent process facilitator. If there is an independent facilitator, who pays for the facilitator and how is the facilitator selected?

**COUNTIES-HDA-IR-2:**

REF: HDA PSOP, OTHER SUGGESTIONS, Part (10)

HDA suggests that the DSM cost recovery section of the existing IRP is no longer necessary or applicable and could be deleted. In as much as the revised IRP will cover KIUC as well as, perhaps, The Gas Company, and recognizing that KIUC has been exempt from the Public Benefits Fund Administrator and will still implement their DSM programs in-house, how would KIUC recover costs if it is deleted from the IRP?

**COUNTIES-BLUE PLANET-IR-1:**

REF: BLUE PLANET PSOP Page 5 C.

Blue Planet has advocated a Clean Energy Implementation Planning (CEIP) process utilized by independent system operators (ISO's) in parts of the United States. Can Blue Planet provide one or two ISO CEIP frameworks that it considers good models to examine? Specifically, CEIP frameworks that employ open and transparent and stakeholder-driven generation and grid-planning processes.

**COUNTIES-DBEDT-IR-1:**

REF: DBEDT PSOP Page 13 No. 9

What kinds of “provisions” should be included in Section III.E of the IRP Framework to encourage and accommodate “actual” public participation and public input? How would DBEDT propose structuring the public input and public participation process to not limit public participation to merely an “advisory role?”

**COUNTIES-KIUC-IR-1:**

REF: KIUC PSOP Page 7-C.

KIUC has indicated that KIUC is not subject to the use of a PBF Administrator to administer KIUC’s energy efficiency programs pursuant to Decision and Order No. 23258 filed on February 13, 2007 in Docket No. 05-0069. Would KIUC be open to working collaboratively with the third party PBF Administrator and the HECO companies regarding information sharing on energy efficiency programs if the PUC’s contract with the Administrator allowed such collaboration?

**COUNTIES-HECO-IR-1:**

REF: HECO PSOP, Renewable Energy Zones (REZs) Page 24

- a. Please provide a detailed example of how a REZ would be established for one or more hypothetical wave farms off of the coast of the island of Maui. Please describe how factors such as environmental impacts, visual

impacts, recreational impacts, cost impacts, public input, and all other factors will be addressed.

b. Please provide a map for the above hypothetical example.

c. Please explain how the above hypothetical REZ will be incorporated into all relevant aspects of the IRP process, including but not limited to, resource assessments, transmission planning, competitive bidding, and advisory group input.

d. Please explain how the above hypothetical REZ would facilitate the planning and development of wave energy projects within said REZ.

e. Please describe any other benefits associated with the establishment of the above hypothetical REZ or with REZs in general, if any.

#### **COUNTIES-HECO-IR-2:**

##### **REF: HECO PSOP, Locational Value Maps (LVMs) Page 26**

a. Please provide a detailed example of how a LVM would be established for a hypothetical resort area on the island of Maui, with distribution system infrastructure unable to accommodate planned resort expansions. Please describe how factors such as environmental impacts, cost impacts, public input, and all other factors will be addressed.

b. Please provide a map for the above hypothetical example.



c. Please explain how the above hypothetical LVM would be incorporated into all relevant aspects of the IRP process, including but not limited to, resource assessments, demand and resource forecasts, competitive bidding, and advisory group input.

d. Please explain how the above hypothetical LVM would facilitate the installation of combined heat and power systems that could obviate the need for distribution system improvements.

e. Please explain how the above hypothetical LVM would facilitate the installation of photovoltaic systems that could obviate the need for distribution system improvements (assume that the anticipated distribution system deficiencies occur during sunny days).

f. Please describe any other benefits associated with the establishment of the above hypothetical LVM or with LVMs in general, if any.

## CERTIFICATE OF SERVICE

I hereby certify that copies of the foregoing Information Requests were duly served upon the following by United States mail, first class postage prepaid, or by electronic mail, as indicated next to the recipient's name, on November 6, 2009, addressed as follows:

CATHERINE P. AWAKUNI  
Executive Director  
Dept. of Commerce & Consumer Affairs  
Division of Consumer Advocacy  
P.O. Box 541  
Honolulu, Hawaii 96809

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Maui Electric Company, Limited

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Certificate of Service

Page 2

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Page 3

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DATED: Līhu'e, Kaua'i, Hawai'i, November 6<sup>th</sup>, 2009.

ALFRED B. CASTILLO, JR.  
County Attorney  
Attorney for Intervenor  
COUNTY OF KAUAI

By

  
\_\_\_\_\_  
MONA W. CLARK  
Deputy County Attorney

**BERNARD P. CARVALHO, JR.**  
Mayor



**ALFRED B. CASTILLO, JR.**  
County Attorney

**FILED**  
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**PUBLIC UTILITIES  
COMMISSION**

**OFFICE OF THE COUNTY ATTORNEY**

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Mona W. Clark  
Michael A. Dahilig  
Marc E. Guyot  
Ian K. Jung  
Justin F. Kollar  
Mauna Kea Trask  
Jennifer S. Winn

**LETTER OF TRANSMITTAL**

November 6, 2009

TO: Public Utilities Commission  
465 S. King Street, Rm 103  
Honolulu, Hawaii 96813

RE: Docket No. 2009-0108, In the Matter of Public Utilities Commission  
Instituting a Proceeding to Investigate Proposed Amendments to the Framework  
for Integrated Resource Planning

We are enclosing copies of the following:

Original + 5 copies – **Counties of Hawai'i, Kaua'i, and Maui's Submission of Information Requests to Hawai'i Solar Energy Association (HSEA); Haiku Design and Analysis (HDA); Blue Planet Foundation (Blue Planet); Department of Business, Economic Development and Tourism (DBEDT); Kaua'i Island Utility Cooperative (KIUC); and Hawaiian Electric Companies (HECO) and Certificate of Service**

- |   |  |
|---|--|
| <input type="checkbox"/> For your information   | <input type="checkbox"/> For necessary action                      |
| <input type="checkbox"/> For your files         | <input type="checkbox"/> For signature in BLACK                    |
| <input type="checkbox"/> For review and comment | <input type="checkbox"/> INK and RETURN                            |
| <input type="checkbox"/> For correction         | <input type="checkbox"/> For signature in BLACK                    |
| <input type="checkbox"/> For distribution       | <input type="checkbox"/> INK and FORWARD TO                        |
| <input type="checkbox"/> Per your request       |  |
| <input type="checkbox"/> Per our agreement      | <input checked="" type="checkbox"/> <b>For filing or recording</b> |
| <input type="checkbox"/> Per our conversation   | <input type="checkbox"/> See remarks below                         |

REMARKS: After filing, please return one file-stamped copy in the self-addressed stamped envelope provided. Thank you for your time and attention to this matter.

Enclosure

  
Mona W. Clark  
Deputy County Attorney

Enclosure(s)